

1 testify about your interactions with John Doe?

2 A I'm not sure.

3 Q Why are you not sure?

4 A Because I don't know.

5 Q Are there any people who you plan to
6 call to testify who have their own interactions with
7 John Doe?

8 MR. HELLER: Okay. So that's
9 basically goes back to what I just said a few
10 minutes ago. Hasn't been discussed with
11 counsel --

12 MR. BORENSTEIN: Doesn't matter.
13 Now's the time to put it on the table.

14 MR. HELLER: Again, so she would not
15 know. She is not conducting the trial. She is
16 --

17 MR. BORENSTEIN: Doesn't matter.
18 BY MR. BORENSTEIN:

19 Q I want to know if she knows of any
20 person that has information relating to activities
21 of John Doe that you plan to call to testify.

22 A I don't know.

23 Q You don't know?

24 A I don't know. I have to think about
25 it --

1 Q So sit and think about it for a few
2 minutes and then tell me if there are any persons
3 that you plan to call to testify who have stories or
4 discussions to tell about John Doe.

5 A Possibly. I don't know.

6 Q Possibly? Who is in the possibly
7 category?

8 A I don't know.

9 Q Are there any women who have ever
10 consulted with you, meaning had a conversation with
11 you and told you John Doe did this to me, John Doe
12 did that to me?

13 A Oh, yeah.

14 Q Who are those people?

15 A Well, one of them is planning to come
16 as a witness for John Doe.

17 Q Who is that?

18 A Nancy Meyer. Who is coming as a
19 witness who has been telling everyone on the singles
20 scene that she's coming as a witness on his behalf,
21 when she originally reached out to me complaining
22 about things that he had done to her.

23 Q What did she tell you that he had done
24 to her?

25 A Well, she said he humiliated her. He

1 contacted --

2 Q Hold it. How did he humiliate her?

3 A Well, according to her testimony, I
4 don't know --

5 Q We don't know.

6 A -- she said that they had a dating
7 relationship. She claimed that it was in 2018.
8 Which is around the same time that -- the acts were
9 going on with John Doe.

10 Q Wait. Let me make sure I'm clear.
11 John Doe she said was dating her the same time that
12 John Doe was having interactions with you?

13 A Well, she thinks it was 2018.

14 Q Okay. You were jealous of her at that
15 time, weren't you?

16 A I was jealous of her? Not quite.

17 Q No? Okay.

18 A No.

19 Q What else did she tell you?

20 A She said that she was mads at him.
21 When she originally started to talk to me she was
22 angry at him.

23 Q But she didn't say that he raped her,
24 did she?

25 A No, she said he humiliated her, that

1 he called her rabbi to say that he had sex with her.
2 And she wanted nothing to do with him.

3 Q But she didn't say that he put stuff
4 in her drink to make her get dizzy, did she?

5 A She didn't tell me that, no.

6 Q And she didn't say that John Doe had
7 pictures of her in intimate positions, did she?

8 A No.

9 Q And you --

10 A She's telling people now that I was
11 jealous of her and that's why she's testifying on
12 his behalf. She also said that he told her that
13 John Doe told her that I'm going around calling her
14 names. Which is untrue.

15 Q John Doe's not calling you names?

16 A What? No, no, no. That's not what I
17 said. He, according to what she is telling people,
18 is that she's testifying on his behalf because he
19 told her that I am saying bad things about her.

20 Q Who told you this?

21 A Mutual friend.

22 Q Who told you this?

23 A A mutual friend.

24 Q Now you have to identify the person.

25 A Mike Leaphardt.